

EXHIBIT
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From: Steve Morris <smorris@valtim.com>
Date: February 11, 2021 at 10:43:31 AM CST
To: Judith Ross <Judith.Ross@judithwross.com>
Cc: Tim Hamilton <thamilton@valtim.com>, pneligan@neliganlaw.com
Subject: RE: In re NRA; Case No. 21-30085-hdh-11

Good Morning Judith,

I would like to introduce myself virtually and am responding to the below email that you sent this morning to Tim Hamilton, CEO at Valtim, Inc..

Valtim also completed and returned the OCC in hopes of serving on the Committee, also to receive notification that we were not selected to participate as a Committee member. I also participated in an interview lasting almost an hour prior to the selection. In receiving the notice listing selected members, Valtim agrees wholeheartedly with your assessment concerning the composition of the Committee as selected. We remain interested in serving on the OCC and would welcome the expansion of said Committee as you suggest.

Please let us know what we can do on our end, we are willing to offer any assistance we can in pursuing additional appointees to the Committee. Should you have any questions or would like to discuss the matter, please feel free to reach out to me at your convenience, my direct line is listed below.

Best,

Steve Morris
VP of Finance



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From: Judith Ross <Judith.Ross@judithwross.com>
Sent: Wednesday, February 10, 2021 6:42 PM
To: ebowman@salesforce.com; vida.krug@cdw.com; dave.hamrick@infocision.com; mmurray@tmadirect.com; wconnor@ovol.us; jim@stonerivergear.com; braun.smith@smicorporate.com; jrmostek@quad.com; linda.fisher@cca.net; dilip@imagedirectllc.com; Tim Hamilton <thamilton@valtim.com>
Cc: pneligan@neliganlaw.com
Subject: In re NRA; Case No. 21-30085-hdh-11

ATTENTION: This is an external email. Exercise caution with links and attachments.

Ladies and gentlemen,

Please see, for your information, the below email, which I sent yesterday to Lisa Lambert, the US Trustee presiding over the NRA bankruptcy case.

I am providing you a copy of this email, because you are one of the creditors of the NRA. My client, Membership Marketing Partners LLC, has expressed concern to Ms. Lambert about the composition of the Official Committee Of Unsecured Creditors appointed in the NRA case, asking that additional vendors of NRA be added to the Committee.

This information is provided for your information and in case you have an interest in serving on such Committee. I have copied Debtors' counsel, Mr. Neligan, with this request. And of course, Ms. Lambert received the original email.

Regards,

Judith W. Ross
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From: Judith Ross
Sent: Tuesday, February 9, 2021 5:50 PM
To: Lisa.L.Lambert@usdoj.gov
Cc: pneligan@neliganlaw.com
Subject: In re NRA; Case No. 21-30085-hdh-11

Hello Lisa,

I hope you are doing well.

You will recall that you invited my client, Membership Marketing Partners LLC, which was listed as the largest undisputed unsecured creditor in the debtors' bankruptcy filings, to fill out the questionnaire you sent in order for my client to possibly serve on the Official Committee of Creditors Holding Unsecured Claims ("OCC"). Thereafter, you interviewed my client's representative, Mr. Murray Drechsler for almost one hour. Last Friday, you advised Mr. Drechsler that Membership Marketing Partners LLC was not selected to serve on the OCC, and you sent him a list of members that would be on the OCC.

Initially, my client has no issue with not being selected to serve on the OCC. However, my client and I have a tremendous issue with the makeup of the proposed OCC, and respectfully request that, at a minimum, at least two more creditors be added to the OCC. Let me explain this request.

Without any organization meeting of the OCC having occurred, your office selected and then suggested that the Pension Benefit Guaranty Corporation serve as "Interim Chair." This is so even though my client believes the PBGC to be, at best, a contingent creditor as there is no suggestion that there are any issues with the Debtor and any benefit obligations. Next, Ackerman McQueen Inc. was selected. As set forth in the initial filings by the Debtor, this creditor's claim is DISPUTED and it is my client's understanding that there is significant litigation pending between this creditor and the Debtor. Further, this highly contentious dispute does not relate solely to lack of payment.

It appears that you selected InfoCision, Inc. (scheduled in the amount of \$712,034.83) and Stone River Gear, LLC (scheduled as a creditor in the amount of \$89,282.80), both of which seem appropriate members of the OCC. But, David Dell'Aquila was selected even though he is not a creditor, but rather a donor who is seeking to organize other donors to challenge the current leadership of the Debtors without regard to the business operations of the Debtor.

Why were these creditors selected over other creditors? I thought that the US Trustee's Office was supposed to select members that fairly represented members of the creditor body? Unfortunately, the majority of the creditors selected and put on the OCC do not appear to represent the interests of the majority of NRA creditors. And why was only a five-member OCC selected? Traditionally, the US Trustee's office selects at least 7 members or more. It is unclear to me how appointing parties that avowedly want to destroy the NRA helps unsecured creditors in any way.

In any event, I assume your Office is prepared to monitor all OCC members to ensure that they do not breach their fiduciary duties to other creditors in all respects. But, at a minimum, my client, Membership Marketing Partners LLC, and, I would trust, many if not most of the trade creditors of the Debtor, respectfully request that the Office of the United States Trustee forthwith appoint not less than two additional creditors from the Debtor's List of Creditors to the OCC, so that the OCC can timely meet, become organized, and work for the benefit of all interested parties.

By regular mail, I plan to send a copy of this email to other unsecured creditors listed on the Debtor's 20 largest unsecured creditor list in hopes that some of them will want to join the OCC.

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